

WISCONSIN HOSPITAL ASSOCIATION, INC.

September 19, 2016

Mark Bowden
Interstate Medical Licensure Compact Commission
Bylaws and Rules Committee
In Care of:
Iowa Board of Medicine
400 SW Eighth Street, Suite C
Des Moines, IA 50309-4689
mark.bowden@iowa.gov



Re: Wisconsin Hospital Association Comments on Interstate Medical Licensure Compact (IMLC) Commission proposed administrative rule Chapter 5, Expedited Licensure

Dear Mr. Bowden:

The Wisconsin Hospital Association (WHA) appreciates the opportunity to comment on the IMLC Commission's proposed rule establishing the qualifications for expedited licensure through the Compact and to define the application process for an expedited license.

WHA's membership includes over 140 member hospitals and integrated health systems whose member organizations also employ the great majority of Wisconsin physicians. WHA was a principal advocate for the enactment of the IMLC in Wisconsin in 2015, as the IMLC can remove redundant red-tape in the medical licensure process and thus increase access to care in Wisconsin communities by creating a voluntary, cost-effective, expedited process for a physician to receive a Wisconsin license and begin providing care to patients in Wisconsin.

Our members are eager to see the IMLC expedited license come to fruition, and we encourage the IMLC Commission to continue to work to achieve its goal of having an operational expedited licensure process by the end of the year. The promulgation of this rule is one step towards that goal.

WHA agrees that the proposed Chapter 5 rule is appropriate and consistent with the IMLC statute. While details regarding fee amounts, timelines for the IMLC Commission and member boards to take action on steps in the expedited licensure process, and what information will be required to be provided in the application are not set forth in this rulemaking, we are expecting that such details will be addressed in subsequent rulemaking and implementation actions subject to public comment.

We also would like to separately comment on the organization of the rule, particularly its heavy reliance on using defined terms to establish policy. While the policy provided in the rule is consistent with the IMLC statute and our expectations, the multiple cross-referenced definitions sometimes make it cumbersome to easily understand what policy the rule is conveying. For example, to fully understand section 5.4(1)f. - which states an applicant "has never been convicted, received adjudication, deferred adjudication, community supervision, or deferred disposition for any offense by a court of appropriate jurisdiction" - a reader would need to refer to six separate defined terms, some of which refer to each other.

While we can understand legal reasons for heavily relying on defined terms in drafting the rule, we are concerned that some physicians and credentialing staff may find it difficult to navigate those parts of the rule that have multiple cross references to defined terms, particularly in section 5.4(1). As an alternative to revising

the organization of the rule itself, the Commission could consider the creation of a plain language FAQ that physicians could rely upon to understand who is and who is not eligible for expedited licensure under the rule. Thank you again for the opportunity to comment on this rulemaking, and we appreciate the work of the Commission to bring the implementation of the IMLC's expedited licensure process to fruition in the coming months. If you have any questions, please contact Matthew Stanford, WHA General Counsel, at 608-274-1820 or mstanford@wha.org.

Sincerely,

A handwritten signature in black ink, appearing to read "Eric Borgerding". The signature is fluid and cursive, with a small mark at the end.

Eric Borgerding, President and CEO
Wisconsin Hospital Association

Cc: Dr. Kenneth Simons – Commissioner, Wisconsin
Robert Zondag – Commissioner, Wisconsin